

HPNS Planning Meeting Agenda

Reference Background Areas (RBAs) and Parcel G

February 28, 2019

- **Welcome and Introductions**

- Navy BRAC: Steve Banister, Sean-Ryan McCray, Rick Phillips, Derek Robinson, Liz Roddy, Paul Stoick
- Aptim: Lisa Bercik, Nels Johnson, Tim Kemper, Randall Killpack, Raymond Schul
- CH2M: John Hackett, Kim Henderson
- Gilbane: Jerry Cooper, Brett Womack

Steve kicked off the meeting. Based on the work plan being close to finalizing, the purpose of the meeting is to get everyone together to discuss the work plan content, changes that have been made to accommodate regulatory requests, and what the work plan addendums will need to include.

Paul indicated that the meeting is not formal or contractually binding and is intended as an open discussion based on schedule delays and flux.

- **Work Plan Status – CH2M/Aptim**

- RTCs and redlined draft final work plan documents with Navy for review/approval
 - Paul provided an update. Work plan comments were received from DTSC, CDPH, and EPA in December 2018 and the most significant comment is related to the PRGs. The Navy has been assessing how PRG changes would impact the evaluation and that is the reason for schedule delays. A letter is expected from EPA this week or early next week to state that the agencies are in agreement with the soil approach as presented in the work plan and to provide partial approval for RBA and Parcel G soil work while technical issues on the building PRGs are resolved. Once the letter is received, the Navy plans to finalize the work plan.
- Changes based on RTCs (underlined):
 - ROCs:

Table 3-4. Soil Radionuclides of Concern

Soil Area	Radionuclide of Concern
Former Sanitary Sewer and Storm Drain Lines	^{137}Cs , ^{226}Ra , ^{90}Sr
Former Buildings 317/364/365 Site	^{137}Cs , ^{226}Ra , ^{90}Sr , ^{239}Pu , ^{235}U
Building 351A Crawl Space	^{137}Cs , ^{226}Ra , ^{90}Sr , ^{239}Pu , ^{232}Th

- Number of samples:
 - The USEPA has requested that a minimum of 25 samples be collected in each survey unit. Therefore, 25 samples will be a placeholder until data from the RBA study become available.
 - EPA has identified the first three trench units in Parcel G to apply the minimum of 25 samples. Afterwards, the number of sample calculation can be updated based on RBA study data when available.
 - The minimum of 25 samples only applies to rework projects; however, the RBA data will be available to be applied on other projects.
- Additional analysis:
 - If any ^{226}Ra gamma spectroscopy concentration exceeds the ^{226}Ra RG and the range of expected NORM concentrations, then the soil sample will be analyzed using alpha spectroscopy for uranium isotopes (^{238}U , ^{235}U , and ^{234}U), thorium isotopes (^{232}Th , ^{230}Th , and ^{228}Th), and ^{226}Ra to evaluate equilibrium conditions. John explained that EPA wanted

to ensure that all the thorium and uranium isotopes were reported by the analytical laboratory and the text throughout the work plan was clarified to include them. Also, based on the ROCs for buildings (identified in the HRA), EPA requested soil sampling at adjacent trench units to the buildings for the building-specific ROCs as follows:

- At the Former Buildings 317/364/365 Site and adjacent TUs 95, 117, 118, and 153, where ^{239}Pu and ^{235}U are ROCs, at least 10 percent of randomly selected systematic soil samples will be analyzed by alpha spectroscopy for ^{239}Pu and ^{235}U .
- At the Building 351A Crawl Space and adjacent TUs 115 and 97, where ^{239}Pu and ^{232}Th are ROCs, at least 10 percent of randomly selected systematic soil samples will be analyzed by alpha spectroscopy for ^{239}Pu and ^{232}Th .
- At TU 107, adjacent to Building 408 where ^{232}Th was an ROC, at least 10 percent of randomly selected systematic soil samples will be analyzed by alpha spectroscopy for ^{232}Th .
- Field Change Request – CH2M
 - San Bruno Park RBA – In the work plan, McLaren Park was identified as the offsite RBA; however, based on a recent site visit with USGS and the regulatory agencies, San Bruno Park was identified as a better location based on less potential for disturbance. A Field Change Request will be prepared and submitted following the final work plan. A pre-draft will be sent to the Navy for review next week.
 - Potential collection of site-specific soil and building data for PRG calculator input
- Work Plan Addendum for Parcel G Soil - Aptim
 - Work Plan and RTCs state that it will include:
 - Contractor-specific information (e.g., Radioactive Material License, SOPs, Organizational Chart, Radiation Protection Plan) - Aptim has a final RPP with SOPs that can be provided to the regulatory agencies if requested.
 - Soil sorting operations plan (including configuration, detector specifications, scan MDCs) – A pre-draft will be sent to the Navy for review next week. If there are delays in reviews and approvals, the potential for RSY pads in lieu of soil sorting was discussed.
 - MDCs for gamma scanning instrument RS-700
 - Dust management plan – Derek indicated that DTSC typically conducts a risk evaluation, identifies contaminants, and safe levels. DTSC also conducts monitoring and collects grab samples. DTSC submitted a letter to the Navy and requested that the Navy incorporate their approach into the process for Parcel G. EPA has not provided formal comments. The Navy requested DTSC's calculations to consider incorporating into the Basewide Air Monitoring Plan. Derek indicated that the Navy will need to provide solid rationale on what we are doing and why and to be able to demonstrate protectiveness. He recommended that Aptim involve a good air quality person and to potentially present at a BCT meeting. Data reporting should demonstrate compliance (e.g., a table to summarize limits and results) and be used as a communication tool for the public. Treasure Island may have an example of a table or reporting tool.
 - Lisa indicated that the current process for air and dust monitoring includes three types and the results are summarized on daily reports:
 1. Perimeter air monitoring from one upwind and one downwind location for TSP, PM10, metals if needed, and asbestos. These samples are sent off-site for analysis and comparison criteria are included in the Basewide Air Monitoring Plan.
 2. Dust monitoring using PDRs and sensors on equipment (e.g., excavators) for health and safety of personnel based on OSHA levels.
 3. Radiological monitoring for ROCs using onsite low volume air monitors for comparison to DAC values.
 - SWPPP
 - SHPO for all rad rework projects

- Received No Adverse Effect letter 1/31/19
- **Reference Background Area Soil Planning – CH2M**
 - Field activities ~1 month
 - Lab analysis and data validation/verification ~2 months
 - Data evaluation and Navy review ~1 month
 - Present background values to regulators for buy-in
 - Prepare draft report for Navy review ~1 month
 - To include background values and how to use for soil data evaluation
 - Final report ~8 months from mobilization
- **Parcel G Planning – Aptim/CH2M**
 - Soil
 - Evaluate Phase 1 data to determine path forward for Parcel G and all Parcels
 - Buildings
 - Scanning Buildings 404 and 351A ~2-month duration following RBA field activities
 - Future coordination and timing
 - Building 404 is the background building at Parcel G and each contractor will need to establish background specific to their instrumentation.
- **Oversight – Navy –**
 - QASP – Based on the high visibility of the rework project, there will be full time on-site Navy oversight and RPMs will conduct frequent site visits. The Navy will develop an internal quality assurance surveillance plan (QASP) for oversight and sight inspections.
 - Agencies - Regulatory agencies will also likely be onsite providing oversight. The public, including media and Parcel A residents, may be viewing work from above the site.
 - Air quality
- **Action Item Review**
 - BRAC - Ask Leo/Chris for air monitoring reporting format for Treasure Island.
 - Lisa - Send Kim the duration for Phase 1 and Phase 2 soil work for Parcel G.
 - Kim - Send meeting attendees the updated timeline graphic.
- **Open Discussion**
 - For Parcel G, for RSY pad scanning, Aptim plans to use the natural background in the area of the RSY pads for instrumentation. Other contractors may use onsite RBAs.
 - For Parcels B and C, for the RSY pads, Gilbane is planning to stage them within the individual parcels, may consider the use of temporary pads, and adapt as needed as to not encroach on the other parcels.
 - Buildings 813 and 819 scanning and soil sampling at Fisher and Spear Aves are also planned and were discussed.